

HONORABLE BARBARA J. ROTHSTEIN

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON**

**SEATTLE DIVISION**

AMBER KRABACH, an individual,

Plaintiff,

v.

KING COUNTY, a local governmental entity, JULIE WISE, in her individual capacity, and in her official capacity as Director of King County Elections; STEVE HOBBS, in his official capacity as Secretary of State of the State of Washington; and JAY INSLEE, in his official capacity as Governor of the State of Washington,

Defendants.

NO. 2:22-cv-01252-BJR

**STIPULATED MOTION AND  
ORDER REGARDING  
BRIEFING SCHEDULE ON  
MOTION FOR PRELIMINARY  
INJUNCTION**

**I. MOTION**

Pursuant to Rule 6(b) of the Federal Rules of Civil Procedure, and Local Civil Rules 7(d)(1) and 10(g), and the Court's Standing Order [D.E. 7], the parties to the above-captioned case, including the Plaintiff, AMBER KRABACH ("Plaintiff"); JAY INSLEE, in his official capacity as Governor of the State of Washington ("Governor Inslee"); STEVE HOBBS, in his official capacity as Secretary of State of the State of Washington ("Secretary Hobbs"); KING COUNTY (the "County"); and JULIE WISE, in her individual capacity and official capacity as

1 Director of King County Elections (“Director Wise”) (collectively, the “Defendants”); by and  
2 through their undersigned attorneys, have stipulated to and hereby jointly request the Court’s  
3 approval of a shortened briefing schedule upon the Plaintiff’s Motion for Preliminary Injunction  
4 (the “Motion”) [D.E. 12], and in support thereof, further state as follows:

5 1. Plaintiff’s Complaint [D.E. 1] was filed on September 7, 2022.

6 2. On September 13, 2022, the Court issued its Standing Order for All Civil Cases  
7 (the “Standing Order”) [D.E. 7], which establishes a briefing schedule on Plaintiff’s Motion  
8 [D.E. 12] different from that established by the Local Rules.

9 3. The Standing Order [D.E. 7] establishes a deadline of October 7, 2022, for  
10 Defendants’ opposition to Plaintiff’s Motion [D.E. 12]. Under that briefing schedule Plaintiff’s  
11 reply would be due October 21, 2022.

12 4. In the Motion [D.E. 12], however, Plaintiff has respectfully requested that the  
13 Court issue a decision on her request for preliminary injunctive relief prior to October 20, 2022,  
14 because Plaintiff believes that she faces irreparable harm, for the reasons set forth in the Motion  
15 [D.E. 12], if preliminary injunctive relief is not entered at that time.

16 5. The undersigned counsel for the parties have conferred as to this issue, in the  
17 course of conferring with respect to the Motion [D.E. 12], and have agreed upon a shortened  
18 briefing upon Plaintiff’s Motion [D.E. 12], such that same can be fully-briefed prior to October  
19 20, 2022.

20 6. The Parties stipulate to and request entry of the following briefing schedule for  
21 Plaintiff’s Motion for Preliminary Injunction [D.E. 12]:

22 i. Plaintiff’s Motion [D.E. 12] was filed and served on all parties as of September  
23 16, 2022.

24 ii. Defendants’ oppositions to the Motion [D.E. 12] shall be filed and served not  
25 later than October 4, 2022;  
26



It is SO AGREED this 19<sup>th</sup> day of September, 2022.

/s/ Cristina Sepe

Cristina Sepe, WSBA #53609  
Karl D. Smith, WSBA #41998  
Deputy Solicitors General  
ATTORNEY GENERAL OF  
WASHINGTON  
P.O. Box 40100  
Olympia, WA 98504-0100  
[Cristina.Sepe@atg.wa.gov](mailto:Cristina.Sepe@atg.wa.gov)  
[Karl.Smith@atg.wa.gov](mailto:Karl.Smith@atg.wa.gov)  
(360) 753-6200

/s/ Robert Bouvatte

Robert A. Bouvatte, Jr., WSBA #50220  
ROBERT A. BOUVATTE, PLLC  
Tumwater, WA 98511  
[bob@rbouvattepllc.com](mailto:bob@rbouvattepllc.com)  
[rbouvattelaw@gmail.com](mailto:rbouvattelaw@gmail.com)  
(904) 505-3175

*Attorney for Plaintiff*

*Attorneys for Defendants Jay Inslee and  
Steve Hobbs*

/s/ David J. Hackett

David J. Hackett, WSBA #21236  
Ann Summers, WSBA #21509  
Senior Deputy Prosecuting Attorneys  
KING COUNTY PROSECUTING ATTORNEY'S  
OFFICE  
1191 Second Avenue, St. 1700  
Seattle, WA 98101  
[David.Hackett@kingcounty.gov](mailto:David.Hackett@kingcounty.gov)  
[Ann.Summers@kingcounty.gov](mailto:Ann.Summers@kingcounty.gov)  
(206) 477-9483

*Attorneys for Defendants King County and  
Director Wise*

**ORDER**

Having reviewed the foregoing stipulated motion and good cause appearing therefore, IT  
IS HEREBY ORDERED:

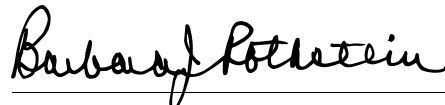
1. The following briefing and hearing schedule shall govern resolution of Plaintiff's  
Motion for Preliminary Injunction in this case:

DATE	EVENT
September 16, 2022	Plaintiff's Motion [D.E. 12] was filed and served.
October 4, 2022	Defendants' oppositions to Plaintiff's Motion [D.E. 12] shall be filed and served.
October 14, 2022	Plaintiff's Reply in Support of the Motion [D.E. 12], if any, shall be filed and served.

2. Except as amended via this stipulation, all other scheduling Orders issued in this  
case shall remain in full force and effect.

IT IS SO ORDERED.

DATED this 19th day of September, 2022.



Barbara Jacobs Rothstein  
U.S. District Court Judge